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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, )  
Plaintiff, )  
vs. )  
MARIO DAVID SANCHEZ, )  
Defendant. )  
)  
)  
)  
)  
)  
)  
2:15-CR-00213-JAD-NJK  
**STIPULATION TO CONTINUE  
SENTENCING AND DISPOSITION  
FOR MARIO D. SANCHEZ**

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, MARIO DAVID SANCHEZ, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, SUSAN CUSHMAN, Assistant U.S. Attorney, that the trial in the above-captioned matter currently set for January 23, 2017 at 9:00a.m. be vacated and continued to at least 60 days to a time after March 27, 2017 at a time convenient for the court.

This Stipulation is entered into for the following reasons

1. Mr. Leventhal will be preparing for Trial in the U.S. vs. Bundy matter and will not be available.
2. Mr. Sanchez is not in custody and agrees with the requested continuance.
3. Mr Leventhal has spoken to Susan Cushman, Assistant United States Attorney, and she has no objection to this continuance.

1       4. Additionally, denial of this request for a continuance could result in a miscarriage  
2       of justice.

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4       DATED this 20<sup>th</sup> day of January, 2017.

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6       /s/ Todd M. Leventhal  
7       TODD M. LEVENTHAL, ESQ.  
Counsel for Mario David Sanchez

6       /s/ Susan Cushman  
7       SUSAN CUSHMAN  
Assistant U.S. Attorney

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11       Submitted By: LEVENTHAL & ASSOCIATES, PLLC

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13       By:       /s/ Todd M. Leventhal  
14                   TODD M. LEVENTHAL, ESQ.  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA, )  
11 Plaintiff, )  
12 vs. )  
13 MARIO DAVID SANCHEZ )  
14 Defendant. )  
15 )

## **FINDINGS OF FACT**

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. Mr. Leventhal will be preparing for Trial in the U.S. vs. Bundy matter and will not be available.
2. Mr. Sanchez is not in custody and agrees with the requested continuance.
3. Mr Leventhal has spoken to Susan Cushman, Assistant United States Attorney, and she has no objection to this continuance.
4. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

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27    ////  
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## **CONCLUSIONS OF LAW**

1. For all the above-stated reasons, the ends of justice would be best served by granting a continuance of the current Sentencing and Disposition Hearing and reset it for a time after March 27, 2017 at a time convenient for the court.

## ORDER

Accordingly, IT IS SO ORDERED that the current Sentencing and Disposition is vacated and the same is continued and reset for April 3, 2017 at 9:00 a.m.

DATED this 20th day of January, 2017.

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JENNIFER A. DORSEY  
UNITED STATES DISTRICT JUDGE

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of January, 2017 a true and correct copy of the,

**STIPULATION AND ORDER TO CONTINUE TIME FOR SENTENCING AND**

**DISPOSITION** was filed through the CM/ECF filing system and was electronically served to the following registered addresses on file for this instant case :

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/s/ Todd M. Leventhal  
An Employee of TODD M. LEVENTHAL, ESQ.  
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